

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE CONSUMER ADVOCATE

Postal Rate and Fee Changes, 1997)

Docket No. R97-1

ANSWERS OF THE OFFICE OF THE CONSUMER ADVOCATE
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE
WITNESS: PAMELA A. THOMPSON (USPS/OCA-T100-40-44)
(FEBRUARY 5, 1998)

The Office of the Consumer Advocate hereby submits the answers of Pamela A. Thompson to interrogatories USPS/OCA-T100-40-44, dated January 29, 1998. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



KENNETH E. RICHARDSON
Attorney
Office of the Consumer Advocate

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USPS/OCA-T100-40. Please refer to your response to USPS/OCA-T100-2.

(a) Please confirm that in addition to the "C language program," other software was used in the production of the OCA's cost results.

(b) If subpart a. is confirmed, please provide a full description of the additional software (for example, SAS, EXCEL, etc.).

(c) If subpart a. is not confirmed, please explain fully.

A. (a) Confirmed.

(b) The additional software available to the OCA and used is: Windows

Notepad, Microsoft Word for Windows 95 version 7.0, "SAS system for Windows v6.12,"

and EXCEL for Windows 95 version 7.0.

(c) N/A

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USPS/OCA-T100-41. Please refer to your response to USPS/OCA-T100-3g. The response states that "Postal Service component 58 was associated with PRC components 901 and 2159" and then provides a clarification of what a duplicate entry in COMP.TXT would look like given information used in Docket No. MC96-3. The original question states:

"In light of the explanation on pages 8-9 of OCA-LR-4 that the USPS component 58 is associated with both Commission components 901 and 2159, please explain your understanding of USPS components 58 and 61, and of Commission components 901 and 2159. Include in your explanation your definition of each of the components, and the volume variable and accrued dollar amounts for each component as shown in the Manual Input Requirement for both the Postal Service's and the OCA's cost model."

Please provide a complete response to the question originally posed, which specifically defines Commission components 901 and 2159, Postal Service components 58 and 61 and which shows the volume variable and accrued dollar amounts for each of these components as shown in the Manual Input Requirement for both the Postal Service's and the OCA's cost model.

A. The question points out a labeling difference between my library references OCA-LR-4 and OCA-LR-6 on the one hand and Docket No. MC96-3, PRC-LR-5, filename PRCCOMP.XLS. The question is whether PRC component 2159 is associated with Postal Service component 58 as stated in Docket No. MC96-3 or with Postal Service component 61 as shown on page 11 of OCA-LR-6, tab OCACOMP.XLS.

The PRCCOMP.XLS file in Docket No. MC96-3, indicates that Postal Service component 58 is equivalent to PRC components 901 and 2159. The PESSA95P.FAC file in PRC-LR-5 indicates that PRC component 2159 is the special delivery messenger key. In PESSA95P.FAC, the statement "xs,2159,2,901,902 /*2159: Special Delivery Mess. Key" indicates that PRC components 901 and 902 (special delivery messenger

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office and street salaries) are summed and the results are stored in PRC component 2159.

In this docket, Postal Service component 58 is associated with PRC component 901. The OCA has associated PRC component 2159 with Postal Service component 61. Postal Service component 61 appears in USPS-T-5, Workpaper A, A Report at 53-54.1. Postal Service component 61, Total Salaries, is the sum of Postal Service special delivery messengers office and street salaries (Postal Service components 58 and 59).

My understanding of Commission components 901 and 2159 and Postal Service components 58 and 61 is limited to the descriptions provided in Docket No. MC96-3, PRC-LR-5, PRCCOMP.XLS and PESSA95P.FAC and Docket No. R97-1, USPS-T-5, WP-A, Manual Input Requirement at 31-32.1 and the A Report at 53-54.1.

The description provided for component 58 by the Postal Service in USPS-T-5, WP-A, Manual Input Requirement at 31-32.1 is "Salaries Office"; the total cost is 18,265. (Trailing zeros omitted.)

The description provided for PRC component 901 by the Commission and used by the OCA is "Special Delivery Messengers- Salaries-Office." OCA-LR-6, tab OCACOMP.XLS at 3. The amount shown for component 901's total cost is 18,265. (Trailing zeros omitted.) See OCA-LR-4, BASEYEAR.BIN at 8.

The description provided for Postal Service component 61 by the Postal Service in USPS -T-5, A Report at 53-54.1 is "Special Delivery Messengers Total Salaries."

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Total costs are 105,629. (Trailing zeros omitted.) The Postal Service's Manual Input Requirement does not show component 61 at 31-32.1.

There is no description listed for component 2159 in OCA-LR-6, tab OCACOMP.XLS Revised 1-13-98. I have no reason to believe the description would be any other than Special Delivery Messengers Total Salaries." The amount for OCA's component 2159 is 105,629. (Trailing zeros omitted.) See OCA-LR-4, BASEYEAR.BIN at 30.

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USPS/OCA-T100-42. Please refer to your response to USPS/OCA-T100-4 and the revised pages 10 and 11 of OCA-LR-6 section OCACOMP.XLS, filed January 13, 1998. Please also refer to workpapers A-1 and A-3 that accompany the testimony of Witness Alexandrovich, USPS-T-5.

(a) Please confirm that the following components appear in Witness Alexandrovich's workpapers A-1 and A-3:

<u>Workpaper A-1</u>	<u>Workpaper A-3</u>
907 pp. 105-106	1307 pp. 105-106
913 pp. 107-108	1363 pp. 107-108
914 pp. 107-108	1314 pp. 107-108
915 pp. 109-110	1315 pp. 109-110
916 pp. 109-110	1316 pp. 109-110
917 pp. 109-110	1317 pp. 109-110
918 pp. 109-110	1318 pp. 109-110
919 pp. 109-110	1319 pp. 109-110
920 pp. 111-112	1320 pp. 111-112
921 pp. 111-112	1321 pp. 111-112
922 pp. 111-112	1322 pp. 111-112
923 pp. 111-112	1323 pp. 111-112
924 pp. 111-112	1324 pp. 111-112
926 pp. 113-114	1326 pp. 113-114
964 pp. 119-120	1364 pp. 119-120
966 pp. 119-120	1366 pp. 119-120
967 pp. 119-120	1367 pp. 119-120
971 pp. 109-110	1371 pp. 109-110

If you do not confirm, please explain fully.

(b) Please confirm that the component pairings listed in part (a) are the same "see also" component pairings that appear on the revised pages 10 and 11 of OCA-LR-6, section OCACOMP.XLS (revised 1/13/98). If you do not confirm, please explain fully.

(c) Please confirm that the component amounts are different within each component pairing shown on the cited Postal Service pages. For instance, component 907 from workpaper A-1 is different than component 1307 from workpaper A-3. If you do not confirm, please explain fully.

A. (a) & (b) Not confirmed. Please note that in the copy of USPS-T-5, Workpaper

A filed with the Commission, the pages for A-3 range from 0.1 to 90.1. The revised

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pages 10 and 11 of OCA-LR-6, section OCACOMP.XLS (revised 1/13/98) are referring
to the following components:

Workpaper A-1

907	pp. 105-106
913	pp. 107-108.1 & 119-120.1
914	pp. 107-108
915	pp. 109-110
916	pp. 109-110
917	pp. 109-110
918	pp. 109-110
919	pp. 109-110
920	pp. 111-112
921	pp. 111-112
922	pp. 111-112
923	pp. 111-112
924	pp. 111-112
926	pp. 113-114
964	pp. 119-120
966	pp. 119-120
967	pp. 119-120
971	pp. 109-110

Workpaper A-3

1307	pp. 19-20.1
913	pp. 5-6.1 & 1363 pp. 19-20.1
1314	pp. 19-20.1
1315	pp. 19-20.1
1316	pp. 19-20.1
1317	pp. 21-22.1
1318	pp. 21-22.1
1319	pp. 21-22.1
1320	pp. 21-22.1
1321	pp. 21-22.1
1322	pp. 21-22.1
1323	pp. 23-24.1
1324	pp. 23-24.1
1326	pp. 23-24.1
1364	pp. 23-24.1
1366	pp. 23-24.1
1367	pp. 25-26.1
1371	pp. 19-20.1

(c) Confirmed.

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USPS/OCA-T100-43. Please refer to your response to USPS/OCA-T100-6.

(a) After receiving the Postal Service's response to OCA/USPS-T5-5a, did you determine that you should have used the Postal Service's I.DAT file? If not, please explain fully.

(b) Please confirm that the Postal Service's I.DAT file is identical to the Manual Input Requirement found in USPS-T-5, Workpaper A. If you do not confirm, please explain fully.

A. (a) & (b) No. For purposes of my testimony, neither file replicated the information in USPS-T-5, Workpaper A, Manual Input Requirement accurately. As I stated in my response to OCA/USPS-T100-6, both files required some editing because the data in them did not match the information in USPS-T-5, Workpaper A, Manual Input Requirement. I did not retain a copy of the SAS conversion of the Postal Service's I.DAT file. However, the discrepancies I noted between the I.DAT file and USPS-T-5, Workpaper A, Manual Input Requirement are noted in the interrogatory posed to Postal Service witness Alexandrovich. Please see the redirected response of Postal Service witness Patelunas to OCA/USPS-T5-3.

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USPS/OCA-T100-44. Please refer to your response to USPS/OCA-T100-7d and the revised page 14 of OCA-LR-4, filed January 13, 1998. Please confirm that the third row of each component in BASEYEAR.DAT contains 4 data numbers followed by the component identifier. If you do not confirm, please explain fully.

A. Confirmed.

DECLARATION

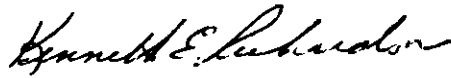
I, Pamela A. Thompson, declare under penalty of perjury that the answers to interrogatories USPS/OCA-T100-40-44 of the United States Postal Service are true and correct, to the best of my knowledge, information and belief.

Executed February 5, 1998

Pamela A. Thompson

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in black ink, appearing to read "Kenneth E. Richardson". The signature is fluid and cursive, with the first name "Kenneth" and last name "Richardson" clearly distinguishable.

KENNETH E. RICHARDSON
Attorney

Washington, DC 20268-0001
February 5, 1998